

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

TATYANA MOORE, et al.)	CASE NO 1:18-cv-01849-JG
)	
Plaintiffs,)	
)	JUDGE JAMES GWIN
)	
vs.)	
)	
CITY OF CLEVELAND,)	
)	DEFENDANT’S ESTIMATE OF FEES
)	AND EXPENSES
Defendant.)	

Defendant, City of Cleveland (“Defendant”), by and through counsel, pursuant to the Court’s Case Management Conference Scheduling Order submits the following preliminary estimate and/or budget of the amount of fees and expenses anticipated to be the subject of any this claim:

ATTORNEY'S FEES:

Preliminary Investigation and Filing Complaint	\$24,000
Procedural Motions Practice	\$5,000
Discovery	\$50,000
Dispositive Motions Practice	\$12,000
Settlement Negotiations	\$2,500
Trial	\$50,000

COSTS:

Depositions	\$15,000
Experts	\$10,000
Witness Fees	\$500
Other	\$0

TOTAL FEES & TOTAL COSTS	\$169,000
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Respectfully submitted,

/s/Michael J. Pike

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CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2018 a complete copy of this document was served by hand delivery upon the Court and opposing counsel during today's Case Management Conference. Additionally, the document is being filed electronically this same day and notice of the filing will be sent to all parties by operation of the Court's electronic filing system. All parties of record may access the document through the Court's electronic filing system.

/s/ Michael Pike

Michael J. Pike
One of the Attorneys for Defendant